FILED

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

2015 APR 21 PM 1: 38

CLERK US DISTRICT COURT VESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

<u>COUNTS ONE - TWO:</u> 18 U.S.C. § 2261A, Stalking.

A15 CR0105 LY

GREGORY CALVIN KING

v.

THE GRAND JURY CHARGES:

<u>COUNT ONE</u> [18 U.S.C. §2261A]

From on or about February 10, 2015, until on or about March 5, 2015, in the Western District of Texas and elsewhere, the Defendant,

GREGORY CALVIN KING,

with the intent to injure, harass, and intimidate the victim, "Jane Doe," a person located in another State, did then and there use the mail, any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to the victim and placed the victim in reasonable fear of the victim's death or serious bodily injury, all in violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

COUNT TWO [18 U.S.C. §2261A]

On or about July 22, 2013, within the Western District of Texas and elsewhere, the

Defendant,

GREGORY CALVIN KING,

with the intent to injure, harass, and intimidate the victim, "Jane Doe," a person located in another

State, did then and there use the mail, any interactive computer service, electronic communication

service, electronic communication system of interstate commerce, and any other facility of

interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause,

and would reasonably be expected to cause substantial emotional distress to the victim and placed

the victim in reasonable fear of the victim's death or serious bodily injury, all in violation of Title

18, United States Code, Section 2261A(2)(A) and (B).

A TRUE BILL

SIGNATURE REDACTED PURSUANT TO E-GOVERNMENT ACT OF 2002

RICHARD L. DURBIN, JR. Acting United States Attorney

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MICHAEL C. GALDO

Assistant U. S. Attorney

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